

REMARKS

INDEPENDENT CLAIM 24

Claim 24 is rejected over Shiiomori in view of Adler. This rejection should be withdrawn for the following reasons:

Claim 24 recites a server that receives text data addressed to a device. The server compares font identifiers in the text data with the device's font capabilities list that is stored by the server, to determine which font structure data the device lacks for rendering the text data. The server then transfers the text data to the device along with the font structure data that the server determined the device lacks. The server then updates its locally stored font capabilities list to reflect the device having stored the font structure data that the server sent it.

Accordingly, the server of claim 24 transfers, to the device, font structure data that the server determined the device lacks based on a comparison that is performed both 1) by the server itself, and 2) on data (the device's font capabilities list) stored by the server itself. This is not disclosed by the references even in combination. The Examiner notes that Adler's server sends glyphs to a device and "Only those glyphs that do not already exist on the electronic device are obtained at Step 40." (col. 12, lines 33-34) However, those glyphs sent by Adler's server are not determined to be lacking from the device based on a comparison 1) **performed by the server itself** as claimed and especially not 2) on a font capabilities list **stored by the server itself** as claimed, but instead based on the server "receiv[ing] one or more requests ... from [the] electronic device requesting one or more glyph sub-sets needed to display electronic data on the electronic device." (Adler, Fig. 3, Step 38; and col. 11, lines 41-45) In other words, Adler's server in Step 40 merely sends, to the device, the "requested glyph sub-sets" (Fig. 3, Step 40) that the device itself requested, which precludes the Adler's server either 1) performing a comparison as claimed or 2) locally storing a device capabilities list as claimed, in order to determine what glyphs to send to the device. And Shiiomori does not transfer any font structure data at all to the device, as the Office Action acknowledges. Accordingly, on two grounds, this limitation (of the server transferring font data that it determined the device lacks based on a comparison it itself performed and on data it itself has stored) is absent from both references.

Claim 24 is distinguished further from the cited art by requiring the server to update its locally stored font capabilities list (for this device) to reflect the device having stored the font structure data that the server sent it. Neither reference discloses this limitation or is even capable of implementing it. That is because Shiiomori's server never transfers font structure data to the device,

as the Office Action acknowledges. And Adler's server has no ability to add a recently-transferred font to a device's font capabilities list because Adler's server keeps no such list. The Office Action cursorily asserts this limitation is disclosed by Adler without specifying any section in Adler to support this assertion, and Applicants find no section in Adler that supports this assertion.

Since the references, even in combination, lack at least two limitations of claim 24, the rejection of claim 24 should be withdrawn.

INDEPENDENT CLAIM 40

Claim 40, like claim 24, is rejected over Shiimori in view of Adler. This rejection should be withdrawn for the following reasons:

Claim 40, similar to claim 24, recites a server that transfers, to a designated device, font structure data that the server determined is not found on the device, based on the device's font capabilities list that is stored by the server itself. This is not disclosed by the references even in combination, as explained above with reference to claim 24.

Claim 40 further requires the server to request and receive the font structure data (that is not found on the device) from another server, and then forward it to the device. This limitation is not disclosed by either reference, and the Office Action does not suggest that it is.

Since the references, even in combination, lack at least two limitations of claim 24, the rejection of claim 24 should be withdrawn.

DEPENDENT CLAIMS 26-30 and 41-42

The remaining claims are dependent claims that are distinguished further from the prior art by the limitations they add to the independent claims.

The application is therefore in condition for allowance.

Respectfully submitted,

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